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March 14, 2009

Easements Program Division
Wetlands Reserve Program Comments
USDA Natural Resources Conservation Service
P.O. Box 2890, Room 6819-S
Washington, DC 20013
Fax: (202) 720-9689

RECEIVED MAR 13 2009

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RE: COMMENTS ON WETLANDS RESERVE PROGRAM (WRP)
Docket Number NRCS-IFR-08013

Dear NRCS Easements Programs Division,

Wild Farm Alliance promotes a healthy, viable agriculture that protects and restores wild Nature. Besides providing educational materials and addressing policy issues on a national level, we work with farmers installing conservation practices in California's Central Coast region. The following comments relate to the WRP as described in the Interim Final Rule:

- **Seven-Year Ownership Requirement.** We feel that the requirement for landowners to have owned their land for 7 years or longer is too stringent. This is especially true for those properties with at-risk species, hence we recommend that waivers be easily granted in these cases.
- **Section 1467.4 Riparian Areas.** WRP should allow the enrollment of riparian areas without being linked to protected areas or farmed/converted wetlands. Riparian areas are critical to many species providing movement corridors through often otherwise uninhabitable landscapes.
- **WREP Landowner Grazing Rights.** We support the Wetlands Reserve Enhancement Program's (WREP) allowance of grazing rights to be reserved to the landowner with a reduction in easement payment. This will help to increase enrollment, especially in the West.
- **Streamlining WREP Grazing.** In order to reduce the unnecessary work for NRCS, we propose that instead of writing individual grazing plans, an ecological condition be integrated into the easement document. Both NRCS and the landowner would take part in creating this document.
- **Section 1467.10 c (1, 2, 3, 4) Eligibility Criteria.** We recommend that this section be eliminated since it does not address the public's trust nor does it ensure the restoration or maintenance of the wetland improvements that were found important in the easement initially. A new landowner that acquires the property with a WRP easement who does not meet eligibility criteria for cost share should not lose WRP funds. Even though NRCS must use eligibility

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requirements as identified in Statute when setting up the easement, the Federal Government is the one responsible for ensuring the original investment is secured and maintained.

- Wetland Reserve Plan of Operation (WRPO). NRCS and partners need to conduct routine monitoring to ensure the work is correctly and to make changes in the plans, if necessary so that the WRPO is treated as a living document.
- Enhancement as a Purpose of the Statute. Enhancement is an important part of this program because it can help to compensate for functions and values of wetlands lost due to dams and large drainage systems.
- Section 1467.11 (a) (2) (ii) Compatible Uses. Hunting and fishing should be a reserved right of NRCS instead of automatically included. Therefore, we suggest that hunting and fishing be removed from this paragraph.

Sincerely,



Jo Ann Baumgartner
Director



TO

Name: Financial Assist. Pro. Div, NRCS
Location:
Reason: Comments on Interim Rule
FAX #: 202-720-9669
Date: March 13, 2009
Number of Pages (including this one): 3

FROM

Wild Farm Alliance
FAX #: 831-761-8103
Phone #: 831-761-8408

FAX MESSAGE

Hello,
Please see 2 attached pages.

Best,
John

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